



Richman & Richman LLC

Michael P. Richman

122 W Washington Ave Suite 850
Madison, WI 53703-2732
608.630.8990
mrichman@randr.law

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Via CM/ECF

Honorable G. Michael Halfenger
Chief United States Bankruptcy Judge
United States Bankruptcy Court
Eastern District of Wisconsin
517 East Wisconsin Avenue, Room 140
Milwaukee, WI 53202

RE: In re: Wisconsin & Milwaukee Hotel LLC
Chapter 11 Case No. 24-21743-gmh

Dear Judge Halfenger:

I am writing on behalf of the Debtor with respect to the Court's Order [Doc 336] entered earlier this afternoon. Today's Order sets a December 17 date for the Debtor to reply to objections to Debtor's Motion for Entry of an Order Extending by 60 Days the Exclusive Periods for Filing Chapter 11 Plan of Reorganization and for Soliciting Acceptances Thereto ("**Exclusivity Motion**") [Doc 318], and a December 19 hearing on the motion. However, absent a bridge order extending for a short time the exclusive period to file a plan and disclosure statement, that exclusive period will expire after December 9, 2024 by statute before the reply and hearing dates.

In the circumstances, we respectfully request that the Court amend today's Order to provide that the Debtor's exclusive period to file a chapter 11 plan and disclosure statement is extended from December 9, 2024 through such date that is seven (7) business days after final disposition of the Exclusivity Motion, in the event that motion is denied.

Respectfully,

RICHMAN & RICHMAN LLC

Michael P. Richman
MPR/hms